

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LEONARD K. BAYLIS :
:
Plaintiff :
: Civ. No: 06-11-SLR
v. :
: JURY OF 12 DEMANDED
STANLEY TAYLOR, et al :
:
Defendant(s) :

**MOTION OF DEFENDANT, GEORGIANA MEEKENS (MORE PROPERLY KNOWN AS
GEORGIANNA MICKENS) TO DISMISS PLAINTIFF'S COMPLAINT¹**

COMES NOW Georgiana Meekens (more properly known as Georgianna Mickens) ("Defendant"), by and through her undersigned counsel, and respectfully moves this Honorable Court to enter an Order pursuant to Federal Rules of Civil Procedure 12(b)(6) dismissing Plaintiff's Complaint for failure to state a claim upon which relief can be granted. In support of this Motion, Defendant offers the Memorandum of Points and Authorities filed simultaneously herewith.

MARSHALL, DENNEHEY, WARNER,
COLEMAN AND GOGGIN

BY: /s/Kevin J. Connors
KEVIN J. CONNORS, ESQUIRE,(DE ID # 2135)
LORENZA A. WOLHAR, (DE ID # 3971)
1220 N. Market Street, 5th Floor
P.O. Box 130
Wilmington, DE 19899-0130
(302) 552-4302
Attorneys for Defendants, Christine Malaney, Anthony Cannuli, M.D., Charles Benton and Georgianna Mickens

DATED: August 15, 2006

¹ The Defendants waive their right to file an Opening Brief and submit this Motion in lieu thereof pursuant to Local Rule 7.1.2. However, the defendants reserve the right to file a Reply Brief.

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Plaintiff	:	
	:	
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	:	
STANLEY TAYLOR, et al	:	
	:	
Defendant(s)	:	

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2006, I electronically filed the Motion of Defendant, Georgiana Meekens (more properly known as Georgianna Mickens), to Dismiss Plaintiff's Complaint with the Clerk of Court using CM/ECF, which will send notification of such filing to the following:

Eileen Kelly, Esquire
Department of Justice
820 N. French Street, 6th Floor
Wilmington, DE 19801

I hereby certify that on August 17, 2006, I have mailed by United States Postal Service, the Motion of Defendant, Georgiana Meekens (more properly known as Georgianna Mickens), to Dismiss Plaintiff's Complaint to the following non-registered participant:

Leonard K. Baylis
SBI00100231
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

MARSHALL, DENNEHEY, WARNER,
COLEMAN AND GOGGIN

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